PD-0552-18
COURT OF CRIMINAL APPEALS
AUSTIN, TEXAS
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DEANA WILLIAMSON

EX PARTE JORDAN BARTLETT JONES

No. PD-0552-18

MOTION TO EXTEND TIME TO FILE BRIEF AND REQUEST FOR ORAL ARGUMENT

FILED COURT OF CRIMINAL APPEALS 10/17/2018 DEANA WILLIAMSON, CLERK

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

PLEASE EXTEND THE TIME FOR MR. JONES TO FILE HIS BRIEF.

Counsel has been occupied litigating other free-speech cases, civil and criminal, in Texas's district courts and courts of appeals. The State's brief in this case is lengthy, and Mr. Jones needs more time to respond. Mr. Jones seeks an additional thirty days, until November 18, 2018, to file his *Petition for Discretionary Review*. Petitioner has sought no previous extensions.

PLEASE ALLOW THE PARTIES ORAL ARGUMENT.

This case is important to Mr. Jones and the State of Texas, obviously, but it is also important to the rest of the states, most of which have passed some sort of revenge-porn-criminalization statute in the last decade.

Even aside from the subject matter, this case is important to the development of free-speech law nationwide. The State's brief makes an argument not raised below: "the level of scrutiny depends on the value of the speech." Oral argument will assist this Court in deciding

whether to be the first to adopt the State's proposed free-speech regime.

CERTIFICATE OF SERVICE

A copy of this motion will be delivered to Hon. Stacey Soule, the State Prosecuting Attorney, by the efiling system.

Thank you,

Mark Bennett

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